

FILED

FEB 17 2015

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,
Plaintiff,

v.

Criminal No. 2:15MJ8

JONATHON SCHRADER,
Defendant.

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of defendant pursuant to 18 U.S.C. 3142(e) and (f).

1. **Eligibility of Case.** This case is eligible for a detention order because case involves (check all that apply):

	Crime of Violence (18 USC § 3156)
	Maximum Sentence Life Imprisonment or Death
	10 + Year Drug Offense
	Felony, with Two Prior Convictions in Above Categories
X	Serious Risk Defendant Will Flee
X	Serious Risk Obstruction of Justice

1. **Reason for Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

X	Defendant's Appearance is Required
X	Safety of Any Other Person and the Community

1. **Rebuttable Presumption.** The United States will invoke the rebuttable presumption against defendant under Section 3142(e). The presumption applies because:

	Probable Cause to Believe Defendant Committed a Crime of Violence for which a Maximum Term of Imprisonment of Ten Years or More is Prescribed
	Probable Cause to Believe Defendant Committed 10 + Year Drug Offense or Firearms Offense (18 USC § 924(c))
	Previous Conviction for "Eligible" Offense Committed While on Pretrial Bond

1. **Time for Detention Hearing.** The United States requests the court conduct the detention hearing

	At First Appearance
X	After Continuance of 3 days (not more than 3)

1. **Other Matters:** _____

DATED this 17th day of February, 2015.

/s/ Paul T. Camilletti
Paul T. Camilletti
Assistant United States Attorney